

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In re:)
) Case No. 17-13654-BFK
BAHRAM AFSHAR) Chapter 13
)
)
Debtor.)

OBJECTION TO CONFIRMATION OF PLAN,
NOTICE OF OBJECTION TO CONFIRMATION OF PLAN, AND
NOTICE OF SCHEDULED HEARING ON THIS MOTION

Woodland Park Homeowners Association (the "Association"), a secured creditor in part, by counsel, has filed this objection to confirmation of the Debtor's Chapter 13 Plan dated November 28, 2017, as a result of Debtors' failure in the proposed Plan to recognize the pre-petition debt owed to the Association, and states as follows:

- 1 The Debtors filed a petition in this court under Chapter 13 of Title 11, United States Code (the Bankruptcy Code) on October 28, 2017.
- 2 The Association's Proof of Claim was timely filed on January 2, 2018 (Claim #3), showing a total claim amount of \$18,212.06. Of this, \$14,408.89 is secured by two perfected statutory assessment liens and three judgment liens. The remaining claim of \$3,803.17 is unsecured.
- 3 The debtor's Chapter 13 Plan fails to recognize any arrearage owed to the Association.

WHEREFORE, the Association prays that its Objection be sustained, and that confirmation of the Debtor's Chapter 13 Plan be denied, and for such other and further relief as this Court deems proper and just.

Respectfully submitted,
Woodland Park Homeowners Association
By Counsel

/s/ Brad M. Barna
Brad M. Barna, VSB No. 88993
Chadwick, Washington, Moriarty,
Elmore, & Bunn, P.C.
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Fairfax, VA 222030
Ph. (703) 352-1900
Email: bbarna@chadwickwashington.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice and Objection to Confirmation of Chapter 13 Plan and Notice of Scheduled Hearing were sent this 3rd day of January 2018, via electronic notice to the following:

Thomas P. Gorman, *Chapter 13 Trustee*
300 N. Washington Street, Ste. 400
Alexandria, VA 22314

Michael J. O. Sandler, Esquire
Fisher-Sandler, LLC
12801 Darby Brooke Court, Suite 201
Woodbridge, VA 22192
Attorney for Debtor

/s/ Brad M. Barna
Brad M. Barna

NOTICE OF OBJECTION TO PLAN, NOTICE OF SCHEDULED HEARING

Creditor, Woodland Park Homeowners Association has filed this Objection to Confirmation of the proposed Chapter 13 Plan filed in case 17-13459-BFK on November 28, 2017.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the motion, or if you want the court to consider your views on the objection, then on or prior to the hearing date, you or your attorney must:

File with the court, at the address shown below, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1 (H). Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above. You must also mail a copy to the persons listed below.

Attend the hearing scheduled to be held on January 11, 2018 at 1:30 p.m. in Courtroom #1, United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

Woodland Park Homeowners Association
c/o Chadwick, Washington, Moriarty, Elmore & Bunn, P. C.
3201 Jermantown Road, Suite 600
Fairfax, VA 22030

Clerk of the Court
United States Bankruptcy Court
200 South Washington Street
Alexandria, VA 22314

Thomas P. Gorman, Chapter 13 Trustee
300 N. Washington Street, Ste. 400
Alexandria, VA 22314

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

CERTIFICATE OF SERVICE

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/s/ Brad Barna
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